



August 8, 2013

BY ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

**RE: Comments on request for Review of Decision by the Universal Service
Administrative Company of Cordova Wireless Communications, LLC**

**CC Docket No. 96-45
WC Docket No. 05-337**

Dear Ms. Dortch:

Copper Valley Wireless, LLC (CVW) supports Cordova Wireless Communications Request for Review of the Universal Service Administrative Company decision to not allow certain mobile lines as eligible for universal support under section 54.307(b) of the Commission's rules due primarily to issues with the reporting of customers billing address.

Copper Valley Wireless operates in some of the same markets as Cordova Wireless Communication and experiences the same issue of some customers billing address being outside of the service area but the majority of the use being within the service area.

Customers in Alaska are mobile in nature and work in the Alaska during the fishing and construction season but winter outside of the service area. Further, many companies that do business in Alaska have corporate addresses outside of the service area.

Copper Valley Wireless experiences about a 10% difference in subscribers who use the CVW network but have an out of market billing address. These subscribers reconnect each spring and use the CVW network almost exclusively but have an out of market billing address. They then disconnect at the end of the commercial fishing season. Like Cordova Wireless Communications, CVW maintains cell sites that are remote and expensive to maintain and operate but that provide essential cellular coverage to the commercial fishing fleet. Cruise ship traffic, oil tanker traffic, as well as the recreational users of the region.

These companies and users purchase local wireless service for reliability. The impact on operations is still there regardless of where the bill is sent. The phone is still used in the Copper Valley Wireless service area. Small rural carriers usually have the most

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robust networks and incur higher costs because of the remote locations of many of the cell sites.

As our society becomes more mobile, and business becomes more global, it is imperative that small rural carriers receive adequate funding to support and sustain their wireless operations. The billing address location has become obsolete as a mechanism for indicating usage. Copper Valley will be submitting its own request for a waiver from the billing address location.

Respectfully submitted,

Via ECFS at 8/9/13

COPPER VALLEY WIRELESS, LLC

David Dengel, CEO/General Manager
PO Box 337
Valdez, Alaska 99686